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Michael Shaheen, III (*pro hac vice* forthcoming) Robert A. Zink (*pro hac vice* forthcoming) Quinn Emanuel Urquhart & Sullivan, LLP 1300 I Street NW, Suite 900 Washington, D.C. 20005 Tel.: (202) 538-8000 michaelshaheen@quinnemanuel.com robertzink@quinnemanuel.com

Dakota Speas (*pro hac vice* forthcoming) Quinn Emanuel Urquhart & Sullivan, LLP 865 S. Figueroa St., 10th Floor Los Angeles, California 90017 Tel.: (213) 443-3000 dakotaspeas@quinnemanuel.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Commodity Futures Trading Commission,

Plaintiff,

V.

Traders Global Group Inc., a New Jersey corporation, d/b/a "My Forex Funds"; Traders Global Group Inc., a Canadian business organization; and Murtuza Kazmi,

Defendants.

Civil Action No. 3:23-cv-11808-ZNQ-TJB

DECLARATION OF ANTHONY J. STALTARI IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*

1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), counsel for Defendants Traders Global Group Inc., a New Jersey corporation doing business as "My Forex Funds," Traders Global Group Inc., a Canadian business organization, and Murtuza Kazmi ("Defendants") in this case. I am familiar with the proceedings in this matter.

2. I respectfully submit this Declaration in support of Defendants' motion, for an Order, pursuant to Local Civil Rule 101.1(c) for the *pro hac vice* admission of Robert Zink, Michael Shaheen, III, and Dakota Speas and for such further and other relief as the Court deems necessary and proper. I am fully familiar with the facts set forth below.

3. Quinn Emanuel has been retained as counsel by Defendants to conduct this litigation.

4. As demonstrated by their respective declarations submitted concurrently herewith, Robert Zink, Michael Shaheen, III, and Dakota Speas are attorneys at Quinn Emanuel. Robert Zink is in good standing with and authorized to practice before the Courts of the State of New York and the District of Columbia. Michael Shaheen is in good standing with and authorized to practice before the Courts of the District of Columbia. Dakota Speas is in good standing with and authorized to practice before the Courts of the State of California. I have reviewed said declarations and believe them to be true and correct.

5. Pursuant to Local Rule 101.1, I certify that I am admitted to am in good standing with the following courts:

State of New Jersey

New Jersey Board of Bar Examiners Richard J. Hughes Justice Complex 25 W. Market Street 8th Floor, North Wing Trenton, New Jersey 08611 (609) 984-2111

Dated Admitted: 4/19/2017

State of New York

Supreme Court of the State of New York Appellate Division: First Department Committee on Character and Fitness 41 Madison Avenue, 26th Floor New York, New York 10010 (646) 386-5893

Dated Admitted: 2/7/2005

U.S. District Court for the <u>District of New Jersey</u>

Martin Luther King Building & U.S. Courthouse 50 Walnut Street, Room 415 Newark, New Jersey 07101 Admitted: 5/12/2017

U.S. District Court for the Eastern District of New York

U.S. Federal Courthouse 225 Cadman Plaza East Brooklyn, New York 11201 (718) 613-2600 Admitted: 5/19/2005

U.S. Court of Appeals for the Second Circuit

Attorney Admissions Thurgood Marshall U.S. Courthouse 40 Foley Square New York, New York 10007 (212) 857-8603

Admitted: 5/12/2017

U.S. Court of Appeals for Veterans' Claims

Attorney Admissions 625 Indiana Avenue, N.W., Suite 900 Washington, D.C. 20004 (202) 501-5970

Admitted: 9/12/2019

U.S. District Court for the Southern District of New York

Daniel P. Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10036 (212) 805-0800

Admitted: 5/17/2005

U.S. District Court for the Northern District of New York

James M. Hanley Federal Building & U.S. Courthouse 100 S. Clinton St. Syracuse, New York 13261 (315) 234-8500

Admitted: 8/1/2019

U.S. Court of Appeals for the Third Circuit

Attorney Admissions
James A. Byrne U.S. Courthouse
601 Market Street
Philadelphia, PA 19106
(215) 597-2995

Admitted: 8/21/2006

6. The above-mentioned counsel are familiar with the facts of this case and have been retained as counsel by Defendants to conduct this litigation. Defendants have requested that the above-mentioned counsel be permitted to assist and represent them during the course of this litigation and trial.

7. I am a member in good standing of the bar of the State of New Jersey and of the

United States District Court for the District of New Jersey. I or another member of Quinn Emanuel

who is a member in good standing of the bar of the State of New Jersey and of the United States

District Court for the District of New Jersey will sign all pleadings filed with the Court on behalf

of Plaintiffs in this matter and will be present for all appearances before the Court unless previously

excused from appearing by the Court.

8. I hereby affirm that I will be responsible for the conduct of the attorneys whose

admission pro hac vice is requested, that I will comply with the requirements of L. Civ. R. 101.1(c),

and that I will assure compliance with L. Civ. R. 101.1(c) by the attorneys whose admission pro

hac vice is requested.

9. All parties who have appeared in this action have confirmed through their counsel

of record that they do not oppose this application.

10. For the foregoing reasons, Defendants respectfully requests that the Court enter an

Order pursuant to Local Civil Rule 101.1(c) admitting Robert Zink, Michael Shaheen, III, and

Dakota Speas pro hac vice in this matter, and for such further and other relief as the Court deems

necessary and proper.

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I declare under the penalty of perjury that the foregoing statements are true and correct.

Executed in New York, New York on this 15th day of September, 2023.

/s/ Anthony J. Staltari Anthony J. Staltari